

Applicant: Valentino Campagnolo
Application No.: 09/886,123

REMARKS

Following entry of the above claim amendment, claims 1, 7, 18, 20, 25, 26, 27 are amended and claims 3-6 and 28 are cancelled. Claims 1, 2, and 7-27 are pending.

The previous Office Action rejected claims 1-28 as either anticipated by or obvious in view of U.S. Patent No. 5,522,282 to Nagano. Nagano shows a cleat and bicycle-pedal attachment that is mounted on the top of a pedal surface using only screws. Nagano's cam means 20a and 20c help release the cleat from the attachment plate by directing the cleat outward and away from the attachment. The cam means are thin metal ramps having a thickness that is the same as the plate.

Nagano does not show or suggest what is now claimed. With respect to claims 1 and 2, Nagano does not show or suggest a "stop ... defined by a projection integral with a metal plate fastened to the pedal defining the cleat contact surface, and wherein the stop comprises a stopping surface that is perpendicular to cleat contact surface and to the axis of the pedal." The Office Action points to Nagano's reference number 20a as a stop means, but the ramps 20a in Nagano Figure 9 do not "comprises a stopping surface that is perpendicular to the cleat contact surface and to the axis of the pedal." The Nagano ramps are at obtuse angles to the pedal plate's

planar surface; what is claimed is a stop that is *perpendicular* to the planar surface. Claims 27 claims a similar perpendicular stop.

With respect to independent claim 7, and dependent claims 8-17, Nagano does not show or suggest a base plate with a pedaling surface “sized and shaped to fit within the planar pedaling surface’s inset.” First, Nagano does not have an inset in a planar surface of its pedal. Second, Nagano’s plate 20 does not fit within any inset; Nagano’s plate 20 just sits on the top surface of the pedal. Because Nagano’s plate rests on top of the pedal, its edges presents another surface for catching dirt and interfering with the cleat or bicycling shoe. In contrast, the claimed inset receives the plate and presents less of an edge to catch dirt and a cleat (see Figure 2 of the current application, showing the cleat contained in the pedal’s inset). Independent claim 18, and its dependent claims 19 and 24, all claim a similar inset and plate combination that is not shown or suggested in Nagano.

Nagano does not show or suggest what is now claimed in independent claim 20 and dependent claims 21-23. Namely, Nagano does not show or suggest means for restricting movement “extending from the base plate and having a thickness greater than the thickness of the base plate.” The cam means 20a and 20c in Nagano are of the same (or lesser) thickness as the base plate. These thin cam means may be bent or deformed under the rigors of riding. The claimed thicker means for restricting provides for a thicker area for the area of the means under

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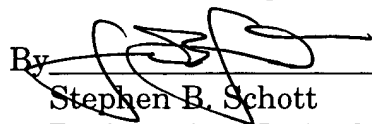
maximum stress during foot removal. Claim 25 claims a similar thicker protuberance.

Finally, Nagano does not show what is claimed in claim 26: "a *U-shaped* base plate." Nagano's plate 20 is substantially rectangular, and in no way U-shaped. Nagano's ninety-degree corners provide stress points that are not present in the U-shaped plate claimed.

Based on the foregoing, all of the pending claims are believed to be in condition for allowance. Reconsideration of the application and allowance of the pending claims is respectfully requested. If for any reason the Examiner believes that an interview, either telephonically or in person, would advance prosecution of the application, the Examiner is requested to contact the undersigned to arrange such an interview.

Respectfully submitted,

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